



Federal Communications Commission Washington, D.C. 20554

May 2, 2005

Mr.Earnest R. Hopseker, Member and Manager Radio Beam, LLC 4524 132nd Avenue, S.E. Bellevue, Washington 98006

DOCKET FILE COPY ORIGINAL

MAY 1 0 2005
FCC - MAILROOM

Re:

Petition for Rule Making Waldport, OR - Channel 253A

Dear Mr. Hopseker:

I am writing in response to the petition for rule making filed by Radio Beam, LLC ("Radio Beam"), requesting the allotment of Channel 253A at Waldport, Oregon, as that community's first local transmission service. In order to accommodate that allotment, Radio Beam proposes the substitution of Channel 236C3 for Channel 252C3 at Dallas, Oregon, and to accommodate the allotment change at Dallas, Radio Beam further proposes the substitution of Channel 252C3 for Channel 236C3 at Monmouth, Oregon.

Radio Beam's allotment proposal is not acceptable. Our engineering analysis reveals that the sites specified in your request for the allotment of Channels 253A and 252C3 at Waldport and Monmouth, respectively, would be short-spaced to one another.

Based on the above, we are returning your proposal for the allotment of Channel 253A at Waldport, Oregon, and channel substitutions at Dallas and Monmouth, Oregon. You may resubmit the petition, provided that you make a showing that a fully-spaced transmitter site is available that provides city grade coverage to the entire community.

1 44

John A. Karousos Assistant Chief Audio Division Media Bureau

Enclosure

COPY

Before the FEDERAL COMMUNICATIONS COMMISSION RECEIVED - FCC Washington, D.C. 20554

In the Matter of

Amendment of Section 73.202(b),
FM Table of Allotments

(Waldport, Dallas and Monmouth, OR)

To: The Chief, Audio Division, Media Bureau

PETITION FOR RULE MAKING

Pursuant to Sections 1.401 and 1.420 of the Commission's Rules, Radio Beam, LLC ("Radio Beam"), hereby petitions the Commission to institute a proceeding looking toward amendment of Section 73.202(b), the FM Table of Allotments, as follows:

Community	<u>Present</u>	Proposed
Waldport, OR		253A
Dallas, OR	252C3	236C3
Monmouth, OR	236C3	252C3

As shown in the attached Engineering Statement, Channel 253A can be allotted to Waldport in compliance with all applicable requirements, provided that Channel 236C3 is substituted for vacant Channel 252C3 at Dallas, OR. The allotment of Channel 252C3 to Dallas, in turn, requires that Channel 252C3 be substituted for Channel 236C3 at Monmouth, OR.

In order to prevent a short-spacing to KNRQ(FM), which operates on Channel 250C at Eugene, OR, an allotment site for Channel 253A at Waldport has been identified at NL 44-30-30,

WL 124-04-07. As shown in the Engineering Statement, principal-city coverage to all of Waldport can be achieved from that site.

To accommodate Channel 236C3 at Dallas, an allotment site has been identified at NL 44-50-43, WL 123-30-07. As shown in the Engineering Statement, principal-city coverage to all of Dallas can be achieved from that site.

To accommodate Channel 252C3 at Monmouth, an allotment site has been identified at NL 44-53-08, WL 123-05-36. As shown in the Engineering Statement, principal-city coverage to all of Monmouth can be achieved from that site. Radio Beam, the licensee of KSND(FM), which is currently authorized on Channel 236C3 at Monmouth, hereby agrees to the channel change at Monmouth and the concomitant change in reference coordinates. Radio Beam further agrees to file an application for a construction permit to modify its facilities to specify Channel 252C3 at a site that will comply with all applicable requirements.

The proposed amendments to Section 73.202 will serve the public interest. Waldport, an incorporated community with a 2000 U.S. Census population of 2050 persons, will be provided with a second local aural service and a first FM service. Moreover, as shown in the Engineering Statement, the proposals in the aggregate will provide new service to 254,812 persons, and the entire "loss area" will continue to receive at least five aural services.

For the reasons stated, it is respectfully requested that the Commission issue a Notice of Proposed Rule Making proposing the amendments to Section 73.202(b) described above. Radio Beam represents that if Channel 253A is allotted to Waldport, Oregon, Radio Beam will file an

¹ The Commission has already determined that Waldport meets the requirements for a "community," since AM station KORC is licensed to Waldport.

application for a construction permit for that channel, and, if its application is granted, will timely construct a facility on such channel.

Respectfully submitted,

RADIO BEAM, LLC

Earnest R. Hopseker

Member and Manager 4524 132nd Avenue, SE

Bellevue, Washington 98006

TEL: 541.574.1005

Dated: December 4, 2003

HATFIELD & DAWSON

JAMES B. HATFIELD, PE BENJAMIN F. DAWSON III, PE THOMAS M. ECKELS, PE STEPHEN S. LOCKWOOD, PE DAVID J. PINION, PE

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO AMEND SECTION 73.202 OF THE RULES AND REGULATIONS FOR THE FEDERAL COMMUNICATIONS COMMISSION

TO ASSIGN FM CHANNEL 253A FOR USE AT WALDPORT, OREGON

TO ASSIGN FM CHANNEL 236C3 FOR USE AT DALLAS, OREGON

TO ASSIGN FM CHANNEL 252C3 FOR USE AT MONMOUTH, OREGON

RADIO BEAM, LLC

11/2003

Engineering Statement

This Engineering Statement has been prepared on behalf of Radio Beam, LLC ("Radio Beam"), in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to:

- 1) Assign Channel 253A for use at Waldport, Oregon;
- 2) Substitute Channel 236C3 for vacant Channel 252C3 at Dallas, Oregon, and;
- 3) Substitute Channel 252C3 for Channel 236C3 at Monmouth, Oregon, for use by FM station KSND.

The proposed reallotment plan will provide several benefits:

- 1) Waldport, an incorporated city with a 2000 Census population of 2,050 persons, will receive its second local service and its first local FM service.
- 2) A total of 254,812 persons will receive an additional aural service.
- 3) In accommodating the benefits listed above, no white, gray, or underserved areas will be created.

Channel 253A at Waldport

As outlined in the attached channel study, Channel 253A can be assigned for use at Waldport in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 236C3 is substituted for the vacant

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Channel 252C3 allotment at Dallas. In order to prevent a short-spacing to KNRQ Channel 250C Eugene, an allotment site has been identified at NL 44• 30' 30" x WL 124• 04' 07". This site is 12.4 kilometers from the most distant point of the City of Waldport. The nominal distance to the 70 dBu F(50,50) contour for a Class A station is 16.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Waldport.

The allotment of Channel 253A at Waldport will provide 60 dBu service to 26,636 persons in a 1,286 km² land area. (A portion of the 60 dBu service area falls over the Pacific Ocean.)

Channel 236C3 at Dallas

As outlined in the attached channel study, Channel 236C3 can be assigned for use at Dallas in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 252C3 is substituted for Channel 236C3 at Monmouth for use by KSND. Channel 236C3 does not fit at the existing Dallas Channel 236C3 allotment site, but an allotment site has been identified at NL 44• 50' 43" x WL 123• 30' 07". This site is 20.0 kilometers from the most distant point of the City of Dallas. The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Dallas.

Channel 252C3 at Monmouth

As outlined in the attached channel study, Channel 252C3 can be assigned for use at Monmouth by KSND in compliance with the Commission's applicable Rules and Regulations

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regarding the separation among FM allotments, assuming that Channel 236C3 is substituted for vacant Channel 252C3 at Dallas. Channel 252C3 does not fit at the existing KSND Channel 252C3 allotment site, but an allotment site has been identified at NL 44• 53' 08" x WL 123• 05' 36". This site is 13.0 kilometers from the most distant point of the City of Monmouth. The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, this site will provide greater than 70 dBu coverage for all of Monmouth.

Gain and Loss Areas

There is overlap among the 60 dBu service areas of all the existing and proposed allotments, and portions of those service areas fall at sea. The attached map titled "Gain and Loss Areas" depicts the 60 dBu service areas, and is annotated to indicate the number of services lost and gained in each area as a result of the proposed reallotment plan. The gain and loss areas are summarized in the table below:

Table of Gain and Loss Areas

	Population and Area
Loss Area	19,488 persons in 1,813 km² land area
Gain Area	254,812 persons in 3,313 km² land area

The proposed reallotment plan will not result in the creation of any white, gray, or underserved areas.¹ The attached "Loss Area Study" exhibit depicts the 60 dBu service contours of a subset of the numerous stations which provide service to the loss area. The contours shown are sufficient to demonstrate that the entire loss area will continue to be well-served, with five or more aural services remaining. The stations whose contours are shown are:

	0000	D-all-sal
KGON-FM	222C	Portland
KPDQ-FM	229C	Portland
KXJM-FM	238C	Portland
KCRF-FM	244C1	Lincoln City
KKSN-FM	246C	Portland
KSHL-FM	248C2	Gleneden Beach
KRKT-FM	260 C 0	Albany
KKRZ-FM	262C	Portland
KPPT-FM	264C2	Depoe Bay
KUFO-FM	266C	Portland
KINK-FM	270C	Portland
KYTE-FM	274C1	Newport
KKCW-FM	277C	Portland
KLOO-FM	292C	Corvallis
KLTH-FM	294C	Portland
KHPE-FM	300C	Albany

¹In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour. See Meeker and Craig, Colorado, 15 FCC Rcd 23858 (2000), Stamps and Fouke, Arkansas, 14 FCC Rcd 10533 (1999), Silverton and Bayfield, Colorado, 14 FCC Rcd 4071 (1999), Malvern and Bryant, Arkansas, 13 FCC Rcd 8426 (1998), and others.

Additional service to the loss area is provided by numerous non-commercial and commercial AM and FM stations. A list of those stations can be provided should the Commission so require.

FMSTUDY.	EXE Copyright 2	002, на	atfield & D	awson, LLC		Version	
SEARCH I	PARAMETERS Channel: 253A 98 Latitude: 44 30 6 Longitude: 124 4 30 Lety Zone: 32 km Job Title: WALDPORT 2	.5 MHz		FN	Database	Date: 0	31105 e 1
Call Status	City C St FCC File No.	hannel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
TOTAL TOM		2500	100.000	44-00-08	125.6	94.72 -0.28	95
VAC NOTE:	DALLAS OR - TO CHANGE TO 236C3 F	252C3 98.3 ER THIS	0.0			75.86 -13.14	
NEW-T APP	DEPOE BAY OR BNPFT-030317HWJ	252D 98.3		44-45-24 124-02-50			0 TRANS
NEW-T APP	DEPOE BAY OR BNPFT-030827APV	252D 98.3	0.030 329.0	44-45-24 124-02-53		28. 42 0.00	0 TRANS
K252DL LIC	WALTON OR BLFT-020619AAS	252D . 98.3		44-04-00 123-37-42		60.06 0.00	0 TRANS
ADD	BEND OR RM-10684	253 C 1 98.5		44-04-41 121-19-57		223.90 23.90	200 CLEAR
NEW APP	EUGENE OR BNPL-010615ALN	253L1 98.5		44-04-18 123-08-01		89.05 0.00	0 LPFM
NEW-T APP	YACHATS OR BNPFT-030313BHF	_	0.250 95.0	44-26-33 124-04-16		6.58 0.00	0 TRANS
NEW-T APP	YACHATS OR BNPFT-030826ALB	_	0.250 95.0	44-26-33 124-04-16		6.58 0.00	0 TRANS
KYTT-FM LIC	COOS BAY OR BLH-950309KD	254C2 98.7		43-27-49 124-05-44		115.35 9.35	106 CLOSE
KWPB-LP	NEWPORT OR BLL-030428AAK	254L1 98.7		44-38-45 124-03-14		16.11 0.00	
KUPLaux LIC	PORTLAND OR BXMLH-000316ABX	254C1 98.7		45-27-13 122-32-45		160.44 0.00	
KUPL-FM LIC	PORTLAND OR BLH-970915KD	254C1 98.7	37.000 440.0	45-30-58 122-43-59		154.60 21.60	133 CLEAR
KUPLaux CP	PORTLAND OR BXPH-970219ID		37.000 362.0	45-30-57 122-43-52		154.69 0.00	

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FMSTUDY	.EXE	Copyright	2002, H	atfield &	Dawson, LLC		Version	1.60
SEARCH Sa	PARAMETERS Channel Latitude Longitude fety Zone	S: 253A 9: 44 30 6: 124 4 30	8.5 MHz	******		1 Database		31105 je 2
Call Status	City St FCC	File No.			Latitude Longitude	Bearing deg-True	(km)	()cm)
KODZ LIC	EUGENE OR BLH-	======================================	256C 99.1	100.000	44-06-56 122-59-56		95.99	
	44444	BEGINNING	SEARCH	OF SECON	DARY DATABASE	44444		
KSND PROP	MONMOUTH OR -		252C3 98.3		44-53-08 123-05-36	60.8		89 SHORT
None PROP	WALDPORT OR -		253A 98.5		44-30-06 124-04-30		0.00 -115.00	
	11111	END OF EM	SPACING	STUDY F	OR CHANNEL 25	3 44444		

Copyright 2002, Hatfield & Dawson, LLC FMSTUDY.EXE Version 1.60 FM Database Date: 031105 SEARCH PARAMETERS Channel: 236C3 95.1 MHz
Latitude: 44 50 43
Longitude: 123 30 7 Page 1

Safety Zone: 32 km Job Title: DALLAS 236C3

Call Status	City C	hannel Freq.	ERP(kW) HAAT(m)	. .	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KMGE LIC	EUGENE OR BLH-970925KE	233C1	49.000		44-00-04 123-06-45			76
NEW-T APP	SALEM OR BNPFT-030317MBL		0.250 58.0	DA	44-58-57 123-00-17			0 TRANS
KPIE-LP LIC	DALLAS OR BLL-020923AAJ		0.100 19.2		44-52-54 123-24-06	62°.9	-	0 LPFM
NEW-T APP	BETHEL OR BNPFT-030317MTX	235D 94.9	0.020 320,0		44-00-08 123-06-50	161.7		0 TRANS
NEW-T APP	BETHEL OR BNPFT-030815AAA	235D 94.9	0.020 315.0		44-00-08 123-06-50	161.7	98.65 0.00	-
KCBZ CP MOD	CANNON BEACH OR BMPH-010208AAV		1.700 378.0		45-57-27 123-50-01		126.31 27.31	
KCBZ CP	CANNON BEACH OR BPH-020227ACX	235C3 94.9	16.000 107.0		45-56-44 123-57-04		127.24 28.24	99 CLEAR
KRAD-LP CP	MILLERSBURG OR BNPL-010615BDY	235L1 94.9	0.010 78.8		44-39-03 123-00-59	119.2	44.11 0.00	
NEW-T APP	ALOHA OR BNPFT-030310AZW	236D 95.1			45-29-20 122-41-40	41.2		0 TRANS
NEW-T APP	BETHANY OR BNPFT-030310BHI	236D 95.1			45-31-23 122-45-07			0 TRANS
KSND-1 APP	DEPOE BAY OR BNFFTB-030724ABI				44-45-24 124-02-53	257.3		0 BOOST
NEW-T APP	INDEPENDENCE OR BNPFT-030310ASJ	236D 95.1		DA	44-58-59 123-08-39			0 TRANS
KSND LIC NOTE:	LINCOLN CITY OR BLH-950403KE KSND TO 252C3 PER TH	236C2 95.1 HIS PRO	258.0		44-45-24 124-02-53		44.32 -132.68	177 SHORT
KSND CP NOTE:	MONMOUTH OR BPH-030729AFK KSND TO 252C3 PER TH	236C3 95.1 HIS PRO	477.0		44-53-19 123-36-26		9. <i>6</i> 1 -143.39	

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Copyright 2002, Hatfield & Dawson, LLC Version 1.60 FMSTUDY.EXE FM Database Date: 031105 SEARCH PARAMETERS Channel: 236C3 95.1 MHz Page 2 Latitude: 44 50 43 Longitude: 123 30 7 Safety Zone: 32 km Job Title: DALLAS 236C3 Channel ERP(kW) Latitude Bearing Dist Req City Call Status St FCC File No. Freq. HAAT(m) Longitude deg-True (km) (km) KLTW-FM PRINEVILLE 236C1 100.000 44-18-32 105.4 212.82 211 120-55-47 1.82 CLOSE OR BLH-850916KA 95.1 144.0 LIC 0.630 44-00-04 161.6 98.80 CRESWELL 237C3 KUJZ -0.20 SHORT OR BLH-920331KC 95.3 368.0 123-06-45 SS LIC 0.030 DA 43-57-26 237D 204.9 108.69 K269DH FLORENCE, ETC. 0.00 TRANS OR BMJPFT-030829AWI 95.3 256.0 124-04-26 APP 0.030 DA 43-57-26 108.69 O 204.9 K269DH FLORENCE, ETC. 237D OR BMJPFT-030314BOA 95.3 256.0 124-04-26 0.00 TRANS APP 40.000 KXJMaux PORTLAND 238C 45-29-20 41.2 95.64

309.0

386.0

0.080

180.0

0.100

152.0

0.000

0.0

122-41-40

45-29-20

44-33-56

123-20-02

44-38-12

44-50-43

123-30-07

124-01-36

122-41-40

0.00

95.64

33.82

47.59

0.00

-153.00 SHORT

-0.36 SHORT

0.00 TRANS

0.00 TRANS

41.2

156.8

240.9

44444

0.0

XUA

96

0

153

44444 END OF FM SPACING STUDY FOR CHANNEL 236 44444

95.5

95.5

239D

239D

95.7

236C3

95.1

44444 BEGINNING SEARCH OF SECONDARY DATABASE

95.7

238C 100.000

OR BLH-981023KC

OR BLH-980901KC

OR BNPFT-030317MFR

OR BNPFT-030317DZX

PORTLAND

FLYNN

NEWPORT

DALLAS

OR -

LIC KXJM

LIC

NEW-T

APP NEW-T

APP

None

PROP

Copyright 2002, Hatfield & Dawson, LLC FMSTUDY.EXE Version 1.60 FM Database Date: 031105 SEARCH PARAMETERS Page

Channel: 252C3 98.3 MHz Latitude: 44 53 8

Longitude: 123 5 36
Safety Zone: 32 km
Job Title: MONMOUTH 252C3

Call Status	City St FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K249DK LIC	NEWBERG OR BLFT-980617TH	249D	0.010	45-21-17 122-59-23	8.8	52.77	0 TRANS
NEW-T APP	SALEM OR BNPFT-0303171B			44-51-18 123-07-15			0 TRANS
KNRQ-FM LIC	EUGENE OR BLH-910528KF	250C 97.9	100.000 308.0	44-00-08 123-06-50		98.17 2.17	96 CLOSE
NEW-T APP	SILVERTON OR BNPFT-030317AQV	250D 7 97.9		DA 45-00-00 122-41-37		34.02 0.00	0 TRANS
NEW-T APP	BEAVERTON OR BNPFT-030317AHF			45-31-21 122-44-45		75.87 0.00	0 TRANS
ADD	BRIGHTWOOD OR RM-9870	251C3 98.1	0.000	45-17-20 121-47-04		112.37 13.37	99 CLEAR
DEL	BEND OR RM-9961	252C3 98.3		44-04-41 121-19-57		166.36 13.36	
KTWS LIC	BEND OR BLH-950629KC		6.800 191.0	44-04-41 121-19-57		166.36 13.36	
VAC NOTE:	DALLAS OR - TO CHANGE TO 236C3	252C3 98.3 PER THI	0.0	44-55-06 123-19-00 AL		18.01 -134.99	153 SHORT
NEW-T APP	DEPOE BAY OR BNPFT-030317HW	252D J 98.3		44-45-24 124-02-50		76.79 0.00	0 TRANS
NEW-T APP	DEPOE BAY OR BNPFT-030827AP	252D 7 98.3					0 TRANS
VAC	RAINIER OR ~	252A 98.3		46-10-18 122-57-42		143.31 1.31	142 CLOSE
NEW-T APP	ROCKFORD OR BNPFT-030317ED	252D V 98.3		45-42-07 121-32-10		152.17 0.00	0 TRANS
NEW-T APP	ROCKFORD OR BNPFT-030825AI	252D Y 98.3	0.250 121.0	45-42-07 121-32-10		152.17 0.00	0 TRANS

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Copyright 2002, Hatfield & Dawson, LLC Version 1.60 FMSTUDY FXE SEARCH PARAMETERS FM Database Date: 031105 Page 98.3 MHz Channel: 252C3 Latitude: 44 53 8 Longitude: 123 5 36 Safety Zone: 32 km Job Title: MONMOUTH 252C3 City Latitude Bearing Dist Channel ERP(kW) Call St FCC File No. Freq. HAAT(m) Longitude deg-True (km)(km) Status 44-04-00 205.2 100.46 K252DL WALTON 252D 0.010 123-37-42 0.00 TRANS OR BLFT-020619AAS 98.3 580.0 LIC NEW-T 252D 0.020 46-02-58 5.9 130.07 LONGVIEW 0.00 TRANS 122-55-07 APP WA BNPFT-030317KJM 98.3 346.0 0.020 DA 46-02-59 130,10 LONGVIEW 252D NEW-T 0.00 TRANS 122-55-10 APP WA BNPFT-030826ABM 98.3 335.0 0.000 122.1 166.36 44-04-41 144 BEND 253C1 ADD OR RM-10684 98.5 0.0 121-19-57 22.36 CLEAR 44-04-18 182.0 90.50 67 0.030 NEW FUGENE 253L1 23.50 CLEAR OR BNPL-010615ALN 98.5 51.5 123-08-01 APP NEW-T 2530 0.250 44-26-33 237.8 91.86 YACHATS 0.00 TRANS 124-04-16 APP OR BNPFT-030313BHF 98.5 95.0 44-26-33 237.8 91.86 NEW~T YACHATS 253D 0.250 95.0 OR BNPFT-030826ALB 124-04-16 0.00 TRANS APP 98.5 KUPLaux PORTLAND 254C1 16.000 45-27-13 34.0 76.41 ٥ OR BXMLH-000316ABX 337.0 122-32-45 0.00 XUA 98.7 76 KUPL-FM PORTLAND 254Cl 37.000 45-30-58 21.8 75.58 OR BLH-970915KD 440.0 122-43-59 -0.42 SHORT 98.7 LIC 254C1 -37.000 45-30-57 21.9 75.61 0 KUPLaux PORTLAND 122-43-52 0.00 AUX OR BXPH-970219ID 362.0 98.7 44444 BEGINNING SEARCH OF SECONDARY DATABASE 44444 0.00 0.0 44-53-08 153 KSND MONMOUTH 252C3 0.000 123-05-36 -153.00 SHORT 0.0 PROP OR -98.3

44444 END OF FM SPACING STUDY FOR CHANNEL 252 44444

0.000

0.0

44-30-06

124-04-30

241.5

88.74

-0.26 SHORT

253A

98.5

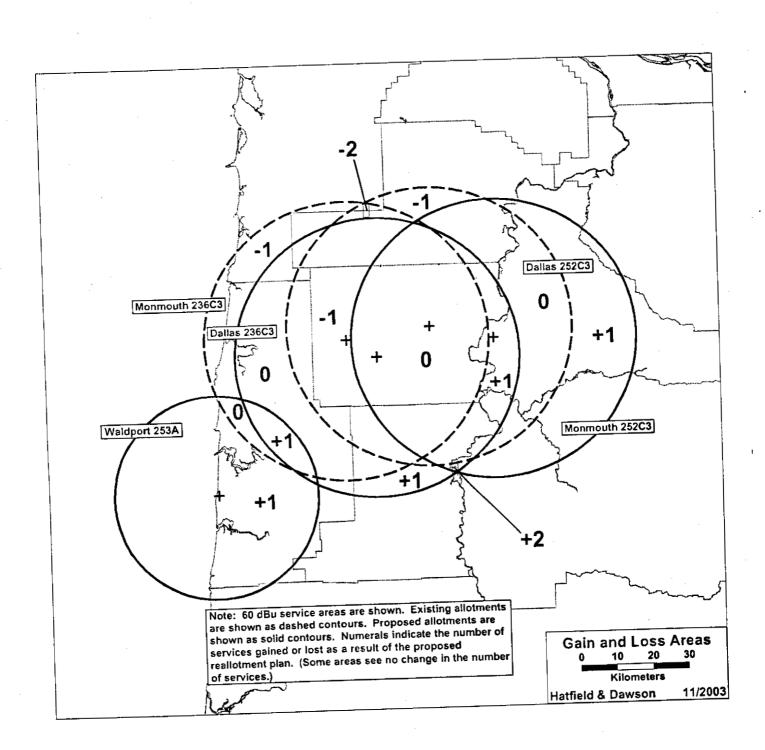
WALDPORT

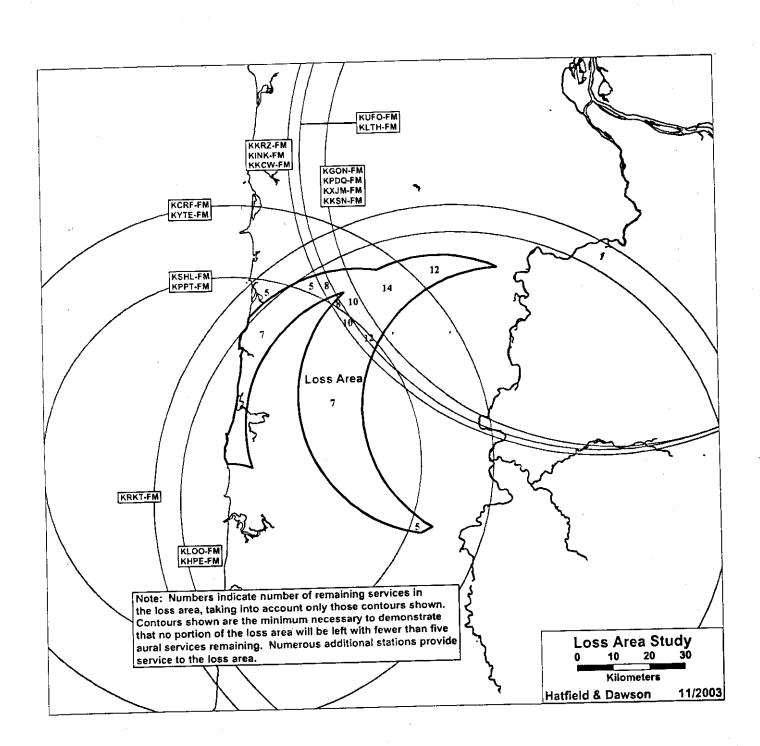
OR -

None

PROP

Hatfield & Dawson Consulting Engineers





Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Dallas, Monmouth, and Waldport, Oregon, has been prepared by Erik C. Swanson, EIT, under my direct supervision. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 17th day of November, 2003



Benjamin F. Dawson III, P.E.